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7 **UNITED STATES DISTRICT COURT**
8 **NORTHERN DISTRICT OF CALIFORNIA**
9 **SAN FRANCISCO DIVISION**

10 IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

MDL No. 3084 CRB

Honorable Charles R. Breyer

11 This Document Relates to:

12 *R.L. vs. Uber Technologies, Inc., et al.*,
13 *3:25-cv-05515*;

14 *P.T. vs. Uber Technologies, Inc., et al.*,
15 *3:25-cv-05677*; and

16 *S.W. vs. Uber Technologies, Inc., et al.*,
17 *3:25-cv-06329*

**DECLARATION OF DOUGLAS
GRUBBS IN SUPPORT OF PULASKI
KHERKHER, PLLC'S MOTION TO
WITHDRAW AS COUNSEL OF
RECORD FOR PLAINTIFFS P.T. AND
S.W.**

18
19 I, Donald Douglas Grubbs, declare:

20 1. I am an attorney with the law firm of Pulaski Kherkher, PLLC (hereinafter "PK" or
21 "firm"). I am a member of the State Bar of Texas and am admitted to practice *pro hac vice*
22 before this Court. I make this declaration based on my own personal knowledge. If called upon
23 to testify, I could and would testify competently to the truth of the matters stated herein.

24
25 2. I met and conferred with opposing counsel on October 7, 2025 prior to Defendants
26 filing their third show cause motion [ECF 4137]. During the meet and confer zoom, I re-
27 viewed the alleged "non-bona-fide receipts" that the above-referenced Plaintiffs previously
28

1 provided during their case intake process. During the meet and confer zoom, I advised opposing
2 counsel of my firm's intention to withdraw as counsel of record should the above-referenced
3 Plaintiffs fail to provide additional ride receipt proof.

4 3. Relying on Defendants' representations during our meet and confer, I personally
5 contacted the above-referenced Plaintiffs via email the same day explaining Uber's concerns
6 and requesting that Plaintiffs provide my firm with any additional proof of their ride at issue,
7 *e.g.*, the email that Uber typically sends upon ride completion.

8 4. My firm followed up with the above-referenced Plaintiffs via telephone on October
9 8 and 14, 2025 and via email on October 14, 2025. My firm also mailed correspondence via 2-
10 day Federal Express on October 16, 2025 giving Plaintiffs until October 22, 2025 to provide any
11 additional proof otherwise my firm would initiate the process of withdrawing as their attorneys.
12

13 5. At the time of filing this declaration, no additional proof supporting the rides at issue
14 has been provided by Plaintiffs P.T. or S.W. nor substitute counsel identified.
15

16 6. However, Plaintiff R.L. contacted my firm on October 23, 2025 and provided
17 additional proof of her ride at issue, *i.e.*, the ride summary receipt emailed directly from Uber.
18 I immediately uploaded said receipt to MDL Centrality and emailed opposing counsel a courtesy
19 copy of the additional ride proof. My firm intends to continue to pursue Plaintiff R.L.'s claims
20 against Defendants and does not seek withdrawal.
21

22 7. My firm has taken reasonable steps to protect the interests and avoid any prejudice to
23 the above-referenced Plaintiffs P.T. and S.W. by informing them of their options and
24 consequences of failing to respond or provide ample time to produce additional proof of the Uber
25 ride at issue. PK's withdrawal from P.T. and S.W. will not impact the timing or schedule of this
26 litigation.
27
28

CERTIFICATE OF SERVICE

I hereby certify that on October 24, 2025, I electronically transmitted the foregoing DECLARATION OF D. DOUGLAS GRUBBS IN SUPPORT OF PULASKI KHERKHER, PLLC'S MOTION TO WITHDRAW AS COUNSEL OF RECORD to the Clerk's office using the CM/ECF system for filing thereby transmitting a Notice of Electronic Filing to all CM/ECF registrants. Additionally, the foregoing was served on Defendants' counsel via email at: ubermdlservice@listserv.shb.com.

/s/ D. Douglas Grubbs
D. Douglas Grubbs